



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

MKP
F. #2017R01840

*271 Cadman Plaza East
Brooklyn, New York 11201*

May 11, 2018

By ECF

The Honorable Nicholas G. Garaufis
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Keith Raniere, et al.
Criminal Docket No. 18-204 (NGG)

Dear Judge Garaufis:

The government respectfully submits this letter to request that the Court enter the attached Stipulation and Order, which has been consented to by all parties. The government requests entry of this Stipulation and Order to protect the compelling governmental interests in this case, including protection of the government's ongoing investigation and the safety of witnesses, some of whom are victims of very serious crimes. See, e.g., United States v. Caparros, 800 F.2d 23, 27 (2d Cir. 1986) (where a defendant obtains documents solely by means of the judicial process, district court has "inherent equitable power to prohibit him from abusing that process by disseminating them"); see also United States v. Amodeo, 44 F.3d 141, 147 (2d Cir. 1995) (need to protect the integrity of an ongoing investigation, including the safety of witnesses, and to prevent interference and other obstruction, may be compelling reason justifying sealing).

In light of the foregoing the government respectfully requests that the Court enter the attached Stipulation and Order.

Respectfully submitted,

RICHARD P. DONOGHUE
United States Attorney

By: /s/ Moira Kim Penza
Moira Kim Penza
Tanya Hajjar
Assistant U.S. Attorneys
(718) 254-7000

cc: Clerk of the Court (NGG) (by ECF)
Defense Counsel (by ECF and email)